

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

C47 TECHNOLOGIES LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Civil Action No. 2:24-CV-00372-JRG

(LEAD CASE)

**JURY TRIAL DEMANDED**

C47 TECHNOLOGIES LLC,

Plaintiff,

v.

LENOVO GROUP LTD., et al.,

Defendants.

Civil Action No. 2:24-CV-00406-JRG

(MEMBER CASE)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

LCFC (Hefei) Electronics Technology Co. Ltd. d/b/a LC Future Center and Lenovo Compal Future Center, Lenovo (Beijing) Limited, Lenovo (Shanghai) Electronics Technology Co. Ltd., Lenovo (Thailand) Limited, Lenovo Centro Tecnolgico S. de R.L. de C.V., Lenovo Information Products (Shenzhen) Co. Ltd., Lenovo PC HK Ltd., Motorola Mobile Communication Technology Ltd., and Motorola (Wuhan) Mobility Technologies Communication Company Limited ("New Defendants") move the Court to extend the time within which they are required to

move, answer, or otherwise respond to Plaintiff's First Amended Complaint. In support of their Motion, New Defendants state as follows:

1. On June 3, 2024, Plaintiff filed its Original Complaint alleging patent infringement against Lenovo Group Ltd, Lenovo (United States) Inc., and Motorola Mobility LLC ("Original Defendants," collectively).

2. The Original Defendants filed a Motion to Dismiss the Original Complaint on October 23, 2024.

3. In response, Plaintiff filed a First Amended Complaint on November 13, 2024, adding the New Defendants as defendants in this case.

4. The Original Defendants filed a Motion to Dismiss the First Amended Complaint as to the New Defendants on December 13, 2024.

5. On January 2, 2025, Plaintiff filed a notice that the summons for the New Defendants were executed on December 20, 2024 for the New Defendants.<sup>1</sup>

6. Counsel for New Defendants and Counsel for Plaintiff have agreed to a 60-day extension of time for all New Defendants to answer or otherwise plead by March 11, 2025.

WHEREFORE, Defendants LCFC (Hefei) Electronics Technology Co. Ltd. d/b/a LC Future Center and Lenovo Compal Future Center, Lenovo (Beijing) Limited, Lenovo (Shanghai) Electronics Technology Co. Ltd., Lenovo (Thailand) Limited, Lenovo Centro Tecnolgico S. de R.L. de C.V., Lenovo Information Products (Shenzhen) Co. Ltd., Lenovo PC HK Ltd., Motorola Mobile Communication Technology Ltd., and Motorola (Wuhan) Mobility Technologies Communication Company Limited, respectfully request that the time in which they are required

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<sup>1</sup> The New Defendants do not agree that they have been properly served. By submitting this request for extension to respond, no defendant is waiving any rights to challenge the sufficiency of service, nor any other basis for seeking to dismiss this complaint, including personal jurisdiction, venue, or failure to state a claim.

to move, answer, or otherwise respond to Plaintiff's First Amended Complaint for Patent Infringement be extended up to and including March 11, 2025.

Dated: January 6, 2025

Respectfully submitted,

/s/ Melissa R. Smith

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*Attorney for New Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 6<sup>th</sup> day of January, 2025.

/s/ Melissa R. Smith

Melissa R. Smith

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for New Defendants met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

/s/ Melissa R. Smith

Melissa R. Smith